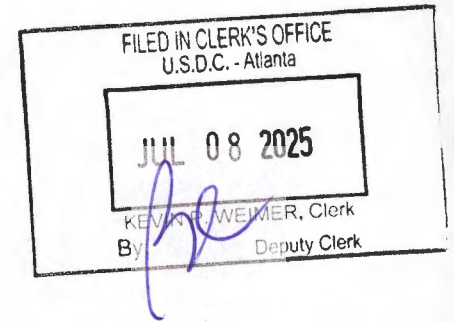


UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA



ANTOINETTE HOLLOWAY, individually
and as parent of her minor child,
Plaintiff,

v.
HILTON ATLANTA PERIMETER SUITES,
HILTON CORPORATION,
GF MANAGEMENT, LLC,
GALLAGHER BASSETT SERVICES,
FAIN, MAJOR & BRENNAN, P.C.,
ROBYN M. FAIN, in her individual
and official capacity,
KATHY GOLD, in her individual
And official capacity as owner of
GF MANAGEMENT LLC

CIVIL ACTION No:
1:25-CV-3781
JURY TRIAL DEMANDED

Defendants.

**COMPLAINT FOR DAMAGES, CIVIL RIGHTS VIOLATIONS, RICO, AND
INJUNCTIVE RELIEF**

Plaintiff Antoinette Holloway, individually and on behalf of her minor child, brings this
complaint against the above-named Defendants and alleges the following:

I. INTRODUCTION

This action arises from the Defendants' collective misconduct following the injury of Plaintiff's
infant child while in the care and control of Hilton Atlanta Perimeter Suites. Instead of accepting
accountability, Defendants have acted in concert to obstruct justice, conceal material facts, and
retaliate against the Plaintiff. These actions constitute not only negligence and breach of duty but

also civil conspiracy, fraud, bad faith, and violations of federal civil rights statutes and RICO provisions.

II. JURISDICTION AND VENUE

This Court has jurisdiction under 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1343 (civil rights), 28 U.S.C. § 1367 (supplemental jurisdiction), and 18 U.S.C. § 1964 (civil RICO). Venue is proper in this district under 28 U.S.C. § 1391(b).

III. PARTIES

1. Plaintiff Antoinette Holloway is a citizen of Georgia and the mother and legal guardian of the injured minor child.
2. Defendant Hilton Atlanta Perimeter Suites is a hotel operating under Hilton Corporation in DeKalb County, Georgia.
3. Defendant Hilton Corporation is a global hospitality company headquartered in Virginia.
4. Defendant GF Management, LLC is a business entity that participated in the operation and/or management of the premises.
5. Defendant Gallagher Bassett Services, Inc. is a third-party claims administrator that denied Plaintiff's claim in bad faith.
6. Defendant Fain, Major & Brennan, Sanford, & Hardee, P.C. is a Georgia-based law firm that engaged in coordinated legal obstruction and retaliation.
7. Defendant Robyn M. Fain is an attorney with Fain, Major & Brennan, Sanford, & Hardee, P.C., who entered appearance in court on July 8, 2025, and whose conduct supports Plaintiff's allegations of legal conspiracy and misconduct.

8. Defendant Kathy Gold is the owner and controlling operator of GF Management, LLC. She is sued in both her individual and official capacities. Although GF Management remains named in court filings, defendant Gold has denied any connection to Hilton. Despite this, she retained legal counsel to represent both herself and GF Management through Fain, Major, Brennan, Sanford, & Hardee, P.C,

IV. FACTUAL BACKGROUND

8. On or about August 22, 2025, Plaintiff's infant child was dropped while in the care of Hilton Atlanta Perimeter Suites, causing trauma and distress.
9. The plaintiff reported the incident and sought redress from the hotel and its insurers, including Gallagher Bassett.
10. Defendants failed to respond appropriately, issued bad faith denials, and sought to frustrate Plaintiff's efforts by requesting irrelevant personal information.
11. The Plaintiff issued a settlement demand. Instead of responding in good faith, Defendants coordinated further obstruction, including fraudulent motions and misrepresentations.
12. Plaintiff filed a Notice of Removal to federal court on July 7, 2025. On July 8, 2025, Robyn Fain entered appearance in court after previously refusing to do so, validating her firm's hidden role in the conspiracy.
13. Defendants have engaged in conduct intended to intimidate, exhaust, and silence Plaintiff.
14. Plaintiff notes that Defendant Kathy Gold is represented by Robyn M. Roth, of Fain, Major, Brennan, Sanford & Hardee, P.C. the same law firm represents GF Management LLC, which remains a named party in this action.

15. Gallagher Bassett, the claims administrator who denied Plaintiff's injury claim, is represented separately by Adams & Reese LLP. Despite the separation in formal representation, the timing and coordination between parties, including legal responses and procedural delays, suggests a broader concerted strategy.
16. While different counsel represents various defendants, their synchronized litigation conduct, including strategic Plaintiff's claim of a coordinated enterprise to obstruct justice, conceal liability, and silence Plaintiff. The overlapping roles of law firms, legal maneuvers, and denials amount to actionable conspiracy under federal law.
- 17.

V. CLAIMS FOR RELIEF

Count I – Negligence

Count II – Breach of Duty of Care

Count III – Intentional Infliction of Emotional Distress (IIED)

Count IV – Fraud & Misrepresentation

Count V – Bad Faith Insurance Practices

Count VI – Civil Conspiracy

Count VII – Violation of 42 U.S.C. § 1983 (Deprivation of Rights Under Color of Law)

Count VIII – Violation of 18 U.S.C. § 1962 (Civil RICO)

Count IX – Violation of the Fair Dealing Doctrine

VI. REQUEST FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the following:

1. Compensatory damages in the amount of \$4.6 Billion;

2. Punitive damages in excess of \$1 billion for civil conspiracy, fraud, and RICO violations;
3. Injunctive relief preventing further retaliation and requiring full disclosure of corporate records;
4. Any other relief deemed just and proper.

Dated: July 08, 2025

Respectfully submitted,

Antoinette L Holloway

Plaintiff Pro Se

1214 Ogilvie Dr NE

Atlanta, Ga 30324

470 718 1590

pbm4antoinette@gmail.com